

November 1, 2022

VIA ECF

The Honorable Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

By **Tuesday, December 20, 2022**, the parties shall file a joint status letter discussing the progress of document production.

The conference scheduled for Friday, November 4, 2022 at 11:00 a.m. is ADJOURNED sine die.

SO ORDERED 11/02/22


SARAH L. CAVE
United States Magistrate Judge

Re: *DoorDash, Inc. v. City of New York*, No. 21 Civ. 7695-AT-SLC
Portier, LLC v. City of New York, No. 21 Civ. 10347-AT-SLC
Grubhub Inc. v. City of New York, No. 21 Civ. 10602-AT-SLC

Judge Cave:

Pursuant to the Court's September 7, 2022 Order (Dkt. 79), Co-Plaintiffs DoorDash, Inc. ("DoorDash"), Portier, LLC ("Portier"), and Grubhub Inc. ("Grubhub"), and Defendant City of New York (the "City") respectfully submit this Joint Letter to update the Court regarding the status of discovery in advance of the Telephonic Status Conference before Your Honor this Friday, November 4, 2022.

Since the parties' August 31, 2022 status update, the parties have made significant progress in document discovery. As the Court knows, all parties have reached agreement with respect to applicable search terms and other issues relating to the scope of party discovery and have proceeded accordingly. And all parties have made substantial initial productions of non-custodial documents. With respect to custodial discovery, the City made its production last week, on October 24, 2022, and Plaintiffs are reviewing that production. Plaintiffs are working toward completion of their custodial productions and anticipate commencing rolling productions of those materials in the coming weeks, with an eye toward beginning to schedule depositions. The parties also are engaged in non-party discovery.

The parties are continuing to meet and confer concerning discovery issues as they arise, and have no ripe disputes or requests to present to the Court at this time.

Respectfully submitted,

/s/ Anne Champion

Anne Champion

Counsel for Plaintiff DoorDash, Inc.

/s/ John C. Quinn

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Counsel for Plaintiff Portier, LLC.

/s/ Karen B. Selvin

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Counsel for Defendant City of New York

/s/ Joel L. Kurtzberg

Joel L. Kurtzberg

Counsel for Plaintiff Grubhub Inc.